



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE - SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CONTAINS ENFORCEMENT-SENSITIVE INFORMATION

MEMORANDUM

DATE: August 7, 2013

SUBJ: Request for a Removal Action at the Allied Platers Site,
Hartford, Hartford County, Connecticut - **Action Memorandum**

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Emergency Response & Removal Section I

THRU: David McIntyre, Chief *DMcI.*
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TO: James T. Owens III, Director
Office of Site Remediation and Restoration

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed removal action at the Allied Platers Site (the Site), which is located at 517 Park St. in Hartford, Hartford County, Connecticut. Hazardous substances present in soil at the Site, if not addressed by implementing the response actions selected in this Action Memorandum, will continue to pose a threat to human health and the environment. There are no nationally significant or precedent-setting issues associated with this Site, and there has been no use of the OSC's \$200,000 warrant authority.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID# : CTN000104183
SITE ID# : 01LD
CATEGORY : Time-Critical



A. Site Description

1. Removal site evaluation

Allied Metal Finishing, aka Allied Platers, had operated the facility between 1950 and 1999. On July 18, 2013, at the request of Mark DeCaprio of the Connecticut Department of Energy and Environmental Protection (CT DEEP), OSC Eric Vanderboom; Jeff Chandler, Rich Scalora, Robert Shuler, Lee Suarez, Edith Pestana and Jackie Pernell from CTDEEP; and Kenneth Foscue with three colleagues from Connecticut Department of Public Health (CT DPH) conducted an on-site reconnaissance of the inactive facility.

The OSC had conducted a site investigation (SI) in 2010, at which time a removal action was not determined to be necessary due to the intact, secured building and lack of exposure routes of any contaminants. Since that time, the building's roof had collapsed and yellow waste previously identified by CT DEEP as hexavalent chromium {Cr(VI)} was emanating from the eastern side of the building onto the unrestricted gravel parking lot, posing a direct contact threat to residents.

The State also indicated contaminated groundwater was infiltrating the adjacent building's basement, staining yellow the interior basement wall and support columns. The CTDEEP collected a soil sample and wipe samples from the building's basement and provided the OSC with their emergency incident report, with photos and analytical results.

The OSC recommended a removal action (RA) in a closure memo dated July 29, 2013.

2. Physical location

The Site is located at 517 Park Street, Hartford, Hartford County, Connecticut. It is bordered to the north by commercial/residential properties, to the south by a vacant lot, to the east by Wolcott St. and west by a parking lot for a local business. Land use in the area is residential and commercial. The geographical coordinates at the approximate center of the Site are latitude 41° 45' 29" north and longitude 72° 41' 08" west.

3. Site characteristics

The Site consists of the Allied Platers building set on the western half of an approximately 0.1 acre, level lot zoned for commercial use. The eastern half of the property is a gravel parking area.

According to the Region ArcGIS mapping tool, within one mile of the Site there are:

- 97,571 people;
- 12 Public Schools;

- 2 Private Schools;
- 12 Daycares; and
- 20 streams and rivers.

According to the EPA Region 1 EJSCREEN mapping tool, the Site is in a low income and minority environmental justice area.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

Yellow waste emanating from the building contains quantities of Cr(VI), a hazardous substance as defined by 40 C.F.R. §302.4, in excess of CTDEEP and EPA/ATSDR screening levels for unrestricted residential/industrial use. In the following table, the highlighted entry indicates the magnitude of exceedence of allowable contaminant levels.

<i>Table 1: Allied Platers Property Contaminant Concentration</i>	
	Hexavalent Chromium - mg/kg (ppm) (total)
Soil Sample from parking lot	10,300
CTDEEP – Residential/Industrial Direct Exposure Criteria for Soil	100
EPA – Soil Reference Dose Screening Concentration	250
EPA – Regional Screening Levels Industrial Soil	5.6
EPA – Regional Screening Levels Residential Soil	0.29

5. NPL status

The Site is not currently on the National Priorities List, and has not received a Hazardous Ranking System rating.

B. Other Actions to Date

1. Previous actions

The OSC had conducted an SI on 10 October 2010, but did not recommend a removal action because no National Contingency Plan (NCP) removal criteria were met at that time.

2. Current actions None.

C. State and Local Authorities' Roles

1. State and local actions to date

July 1999 - CTDEP¹ received a complaint regarding the abandonment of hazardous waste at the Site by the recently vacated industrial tenant.

April 2000 - CTDEP Notice of Violation (NOV#1042) was issued to the former site operator Allied Platers/Allied Metal Finishing for improper closure of the facility under RCRA.

May 2013 - CTDEEP Emergency Response Unit (ERU) was requested to investigate a potential Cr(VI) release at the property. CTDEEP ERU collected samples and issued an emergency incident report.

2. Potential for continued State/local response

Neither CTDEEP nor the City of Hartford has the resources to conduct a comprehensive removal action, but they are both willing to participate in a collaborative removal action effort and continue to provide active support, public outreach and a regulatory role. The City of Hartford has committed to demolishing the building and disposing of the building debris. The CTDEEP has committed to cleaning the contaminated basements of the adjacent buildings.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants; [§300.415(b)(2)(i)];

High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate [§300.415(b)(2)(iv)];

Cr(VI) contamination in surficial soil on the Allied Platers property presents a public health threat. The exposure pathways include direct exposure and exposure to dust from wind transport. Specific pathways include:

- Dermal contact while playing in/on the soil and via dust;

¹ CT DEEP was previously the Connecticut Department of Environmental Protection (CT DEP).

- Ingestion, especially by children when playing;
- Inhalation, especially by children when playing and via dust; and

Specifically, Cr(VI) contamination is at concentrations greater than either the CTDEEP standards for residential/industrial soils or EPA/ATSDR levels for unrestricted residential use.

Under the current guidelines (EPA, 1986), Cr(VI) is classified as Group A - known human carcinogen by the inhalation route of exposure. Carcinogenicity by the oral route of exposure cannot be determined and is classified as Group D - not classifiable as to human carcinogenicity, without adequate data either to support or refute human carcinogenicity.

Under the proposed guidelines (EPA, 1996), Cr(VI) would be characterized as a known human carcinogen by the inhalation route of exposure on the following basis.

Cr(VI) is known to be carcinogenic in humans by the inhalation route of exposure. Results of occupational epidemiologic studies of chromium-exposed workers are consistent across investigators and study populations. Dose-response relationships have been established for chromium exposure and lung cancer. Chromium-exposed workers are exposed to both Cr(III) and Cr(VI) compounds. Because only Cr(VI) has been found to be carcinogenic in animal studies, however, it was concluded that only Cr(VI) should be classified as a human carcinogen.

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [§300.415(b)(2)(v)];

Cr(VI) in the soil at the surface presents a threat of migrating in dry weather conditions as fugitive dust, and in extremely wet conditions as run-off.

The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)].

State and local agencies do not have adequate resources to completely address this Site.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances or pollutants or contaminants from this Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment. In accordance with OSWER Directive 9360.0-34 (August 19, 1993) [17], an endangerment determination is made based on "appropriate Superfund policy or guidance, or on collaboration with a trained risk assessor."

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The response actions described in this memorandum directly address the actual or potential release of hazardous substance, which may pose an imminent and substantial endangerment to public health, welfare, or the environment. Specific removal activities will include the following:

- Develop and implement a Site Health and Safety monitoring plan;
- Conduct a site walk with the cleanup contractor;
- Conduct additional sampling as needed;
- Perform public communication and outreach activities;
- Provide security services as required by the OSC;
- Inventory and document existing property conditions;
- Clear vegetation, debris and other obstructions as needed;
- Excavate contaminated soil, waste piles and any other hazardous materials encountered;
- Perform dust control and mitigation measures as necessary;
- Backfill excavations;
- Pre-treat hazardous substances if beneficial for off-site disposal options;
- Dispose of hazardous substances at an EPA-approved off-site disposal facility; and
- Repair response-related damages and security fencing as necessary.

This removal action will be conducted in a manner not inconsistent with the NCP.

2. Community relations

The OSC will interact with the community throughout the cleanup and will coordinate closely with State and local authorities, and with EPA Community Involvement Coordinators (CIC) on community relations activities.

3. Contribution to remedial performance

The cleanup proposed in this Action Memorandum is designed to mitigate the threats to human health and the environment posed by the Site. The actions taken at the Site would be consistent with and will not impede any future responses.

4. Description of alternative technologies

The use of alternative technologies is not anticipated.

5. Applicable or relevant and appropriate requirements (ARARs)

Federal ARARs:

40 CFR Part 262 Standards Applicable to Generators of Hazardous Waste:

Subpart B - The Manifest

262.20 : General requirements for manifesting

262.21 : Acquisition of manifests

262.22 : Number of copies of manifests

262.23 : Use of the manifest

Subpart C - Pre-Transport Requirements

262.30 : Packaging

262.31 : Labeling

262.32 : Marking

Subpart D - Recordkeeping and Reporting

262.40 : Recordkeeping

40 CFR Part 264 Standards for Owners and Operators of Hazardous waste Treatment, Storage, and Disposal Facilities:

40 CFR Part 264 Hazardous Waste Regulations - RCRA Subtitle C:

268-270 : Hazardous and Solid Waste Amendments Land Disposal Restrictions Rule

40 CFR Part 300.440 Procedures for Planning and Implementing Off-Site Response Actions (Off-Site Rule)

40 CFR Part 61: Clean Air Act standards for controlling dust

State ARARs:

The OSC will coordinate with State officials to identify additional State ARARs, if any. In accordance with the National Contingency Plan (NCP) and EPA Guidance Documents, the OSC will determine the applicability and practicability of complying with each ARAR which is identified in a timely manner.

6. Project schedule

All work is expected to be completed within six months from the mobilization date.

B. Estimated Costs

COST CATEGORY		CEILING
<i>REGIONAL REMOVAL ALLOWANCE COSTS:</i>		
ERRS Contractor		\$320,000.00
Interagency Agreement		\$ 0.00
<i>OTHER EXTRAMURAL COSTS NOT FUNDED FROM THE REGIONAL ALLOWANCE:</i>		
START Contractor		\$40,000.00
Extramural Subtotal		\$360,000.00
Extramural Contingency	10%	\$36,000.00
TOTAL, REMOVAL ACTION CEILING		\$396,000.00

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action will increase public health risks due to potentially increased exposure to Cr(VI). Without the removal action described herein, conditions at the Site will remain unaddressed, and threats associated with the hazardous substances will persist and may increase.

VII. OUTSTANDING POLICY ISSUES

There are no precedent-setting policy issues associated with this Site.

VIII. ENFORCEMENT ... For Internal Distribution Only

See attached Enforcement Strategy.

The total EPA costs for this removal action based on full-time accounting practices that will be eligible for cost recovery are estimated to be \$396,000 (extramural costs) + \$24,000 (EPA intramural costs) = \$420,000 X 1.4485 (regional indirect rate) = **\$608,370.2**.

²Direct Costs include direct extramural costs \$396,000 and direct intramural costs \$24,000. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site specific costs $44.85\% \times \$420,000$, consistent with the full

IX. RECOMMENDATION

This decision document represents the selected removal action for the Allied Platers Site in Hartford, Connecticut, developed in accordance with CERCLA, as amended, and is not inconsistent with the National Contingency Plan. The basis for this decision will be documented in the administrative record to be established for the Site.

Conditions at the Site meet the NCP Section 300.415 (b) (2) criteria for a removal action due to the following:

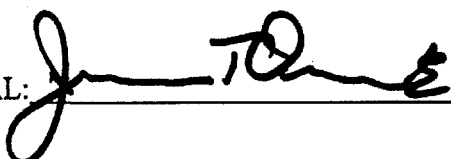
Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants [§300.415(b)(2)(i)];

High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate [§300.415(b)(2)(iv)];

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [§300.415(b)(2)(v)];

The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)].

I recommend that you approve the proposed removal action. The total extramural removal action project ceiling if approved will be \$396,000.

APPROVAL: 

DATE: 8/8/13

DISAPPROVAL: _____

DATE: _____

accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.